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| 4 | JEFFREY R. FINIGAN (CASBN 168285) Assistant United States Attorney |
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| 9 | Attorneys for Plaintiff |
| 10 | UNITED STATES DISTRICT COURT |
| 11 | |
| 12 | NORTHERN DISTRICT OF CALIFORNIA |
| 13 | SAN FRANCISCO DIVISION |
| 14 | |
| 15 | UNITED STATES OF AMERICA,) Criminal No. CR 07-0479 WHA |
| 16 | Plaintiff,) |
| 17 | v. STIPULATION AND [PROPOSED] - ORDER EXCLUDING TIME & CONTINUE |
| 18 |) CONTINUING HEARING |
| 19 | DEBRA EDISON,) |
| 20 | Defendant.) |
| 21 | |
| 22 | The above-captioned matter came before the Court on October 16, 2007. The defendant |
| 23 | was represented by Shawn Halbert, Esq., and the government was represented by Jeffrey Finigan, |
| 24 | Assistant United States Attorney. The matter was set before this Court for jury trial on February |
| 25 | 4, 2008, at 7:30 a.m. |
| 26 | The Court made a finding that the time from and including October 16, 2007, through and |
| 27 | including February 4, 2008, should be excluded under the Speedy Trial Act, 18 U.S.C. |
| 28 | § 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best |
| | STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME CR 07-0479 WHA |

interest of the public and the defendant in a speedy trial. The finding was based on the need for the defendant to have reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

The parties hereby agree to and request that the case be continued until February 4, 2008, and that the exclusion of time until then be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A), because the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively prepare, taking into account the exercise of due diligence, and will provide for continuity of counsel for the defendant.

DATED: October 16, 2007 /s/

SHAWN HALBERT Counsel for Debra Edison

DATED: October 16, 2007

JEFFREY R. FINIGAN Assistant U.S. ALLOHOL

So ordered.

DATED: October 18, 2007.

UNITED STATES DISTRICT COURT JUDGE

STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME CR 07-0479 WHA